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UNITED STATES DISTRICT COURT
FOR CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiffs,
v.
YANNICK MAI,
Defendants.

CASE NO.: CR 17-00423-AB
DEFENDANT'S PSR
OBJECTIONS

Sent Date: April 26, 2019
Sent Time: 1:30 pm

Hon. Andre Birotte, Jr.

DEFENDANT'S POSITION RE: FACTUAL OBJECTIONS

Paragraph 33:

Paragraph 33 states in the final sentence that "Mai is ineligible for the reduction because he maintained a leadership position during the course of the offense. Accordingly, no adjustment is applied."

The defendant objects to that passage because it is inaccurate, misleading and should be stricken. Mr. Mai did not maintain a leadership position.

Paragraph 36:

Paragraph 36 states “Mai exercised authority over the scheme to transport methamphetamine from Los Angeles to Tahiti and expected to be paid \$20,000 for his participation in the offense. Mai also oversaw the conduct of Coupel and his daughter, T. Mai. His role was that of an organizer in the methamphetamine transportation; therefore, two levels are added. USSG §3B1.1(c).”

The defendant objects to that passage because it is inaccurate, misleading and should be stricken. Mr. Mai’s conduct clearly is indicative that he was no organizer -- he taped the contraband to his thigh believing that he could get by with such, obviously a sign of inexperience, knowledge and/or any organization skills.

DATED: April 22, 2019

By: /s/ Michael S. Devereux
MICHAEL S. DEVEREUX
Attorney for Defendants
YANNICK MAI